

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

GEORGE W. JACOBY, Esquire, Executor  
of the ESTATE OF PATRICIA WATTS,  
Deceased,

Plaintiff,

v.

ALLEGHENY COUNTY, as owner and  
operator of JOHN J. KANE REGIONAL  
CENTER-SC doing business as KANE  
SCOTT CENTER, a skilled nursing  
facility,

Defendant.

Case No. 2:21-cv-00173-WSH

**MOTION FOR DISMISSAL OF ACTION**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff, George W. Jacoby, Esquire, Executor of the Estate of Patricia Watt, Deceased, and Defendant, Allegheny County as owner and operator of John J. Kane Regional Center-SC d/b/a Kane Scott Center doing business as Kane Scott Center, a skilled nursing facility, stipulate and agree to dismissing the instant action with prejudice, each party to bear its own costs and attorney's fees.

Respectfully submitted,

By: /s/ Katelyn D. Edwards

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Defendant.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Dismissal of Action through the Court's ECF notification system on this Date upon the following counsel of record:

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Respectfully submitted,

By: /s/ Katelyn D. Edwards  
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